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United States District Court
District of New Hampshire
U.S. DISTRICT COURT
DISTRICT OF NH
FILED
2017 SEP 18 A 11:34

Jonathan Andrew Perfetto
Plaintiff, Pro-Se

v.

1:14-cv-556-AJ

Marc Cussen, et al
Defendants

Plaintiff's Pre-Trial Statement

NOW COMES the Pro-Se Plaintiff,
Jonathan Andrew Perfetto, and files his
Pre-Trial ~~to~~ Statement in accordance with FRCP&LR.

~~I Brief~~ BRIEF STATEMENT OF CASE

1. The crux of this case seems from a RLUIPA
claim that occurred from January 2010 -
November 14, 2010 And again from January 4, 2011 -

December 19, 2011

1A. The violation of the Plaintiff's Constitutional rights when he ordered numerous pamphlets ~~in~~ in January 2010 from Gospel Messenger Service in Lancaster, NH to proselyze The Good News about Jehovah God's Kingdom in Heaven and Earth.

some time in February 2010

1B. When the pamphlets arrived ~~at~~ ^{to} the Mailroom, Defendant Marie Blanchette rejected all pamphlets sans one copy of each pamphlet, because they were intended for distribution.

1C. The Plaintiff correctly engaged in the grievance process and this case was ~~filed~~ originally filed about October 6, 2012 - voluntarily dismissed on December 27, 2013 and successfully refiled December 15, 2014.

II. ~~Plaintiff's~~ PLAINTIFF'S WITNESSES

1. Inmate Gregg Blackstock - NH State Prison Concord, NH.

The purpose of his testimony is what ~~the~~ Plaintiff taught the Plaintiff while studying various Jehovah Witness material.

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2. Lt. Andy Drew Newcomb, Corrections Officer, NH State Prison, Concord, NH

His testimony will reflect why the Plaintiff was arrested May 1, 2009

3. Major John Fouts, Chief of Security, NH State Prison, Concord, NH

His testimony will involve Plaintiff's behavior from March 2002 - April 2005, April 2005 - August 2006.

4. New Word Translation of Holy Scriptures (Pending Acceptance of a Motion In Limine [to be filed at a later date]).

5. The Plaintiff - Montana State Prison Deer Lodge, MT.

His testimony will reflect history of practicing Christianity

III WAIVERS OF CLAIMS OR DEFENSES

Plaintiff does not waive any claims or defenses

IV LIST OF ALL DEPOSITIONS WHICH MAY BE READ INTO EVIDENCE

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None were ~~re~~ taken

V PLAINTIFF'S EXHIBITS

Plaintiff's August? 2016'

I The Plaintiff does not have his legal work with him; so please bare with the Plaintiff about dates.

letter,

5A. Plaintiff's ~~is~~ October? 2016 letter

VI JERS STATEMENT

Plaintiff is unaware what a JERS STATEMENT is and has law library (books sign out only) every two weeks.

VII SPECIALIZED DAMAGES

The Plaintiff has asked for Punitive Damage^s
He does not recall the amount (see f.n.1)

VIII STATEMENT OF DEMAND OFFER

Defendants are correct in which negotiations continue. Since the Writing of Defendants Pre-Trial Statement, the Plaintiff has written to two people about buying books & donating them to HCHC. One said yes, however, he told the head of the ministry not to order until defendant's call the Book store to find out if they meet the jails security standards.

IX CLAIMS FOR ATTORNEY'S FEES

Defendant does not wish to collect attorney's fees (see 42 U.S.C. § 1988)

X REQUEST FOR VIEWS

Not applicable to this case

XI ESTIMATE OF TRIAL LENGTH

Plaintiff anticipates 1 1/2 days

Legal Memorandum

Due this Not being a Motion, no Legal Memorandum^m is necessary.

Concurrence Statement

Since this document is not a Motion, no Concurrence is necessary.

WHEREFORE the Pro-Se Plaintiff,
Jonathon Andrew Perfetto, ~~§~~ graciously implores
this Highly Revered Court to:

A. Add this ~~s~~ Pre-Trial Statement
to the docket.

B. Grant such ~~o~~ther relief as
just and appropriate.

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Graciously Offered,

Jonathan Andrew Perfetto

Jonathan Andrew Perfetto
3022186

Montana State Prison
MDIU Cell L3 11 Bottom
700 Conley ~~Road~~ Lake Road
Deer Lodge, MT 59722

Certificate of Service

I hereby certify Defense Counsel received
a copy of this document via ECF

September 12, 2017

Date

Jonathan Andrew Perfetto
Jonathan Andrew Perfetto
Plaintiff ~~vs~~ Pro-Se

Ormekhan Dr. Robinsonville Perfection
Box 2186
Dorcenley Lake Road
Deer Lodge, MT 59722-8711

Daniel Lynch, Clerk of Court
U.S. District Court
55 Pleasant St
Concord, NH
~~03301-3941~~ 03301-3941



FOREVER
USA

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Logan Mail

033013941



Mr. Jonathan Andrew Perfetto
ID# 3022186
Montana State Prison - MDIU
Cell LB 11 Bottom
700 Conley Lake Road
Deer Lodge, Montana 59722-8711

September 11, 2017 ³09/17/17

Mr. Daniel Lynch, clerk of Court
U.S. District Court - DNH
55 Pleasant ~~St~~ Street
Concord, NH 03301-3941

RE: Perfetto v. Cusson, et al 1:14-cv-556-AJ

Dear Mr. Lynch: ^{it is}
Enclosed ~~is~~ ^{is} my pre-trial statement. If ~~they are~~ ^{it is} tardy,
I apologize for any inconvenience.

Sincerely/God Bless,

Jonathan A. Perfetto

Jonathan A. Perfetto